

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. APPLN. NO. 09/855,502  
ATTORNEY DOCKET NO. Q64471

**REMARKS**

The Examiner has indicated the "some" of the certified foreign priority document, French Patent Application No. 0006356 dated May 18, 2000, has been received. A complete foreign priority document was filed on May 16, 2001, and Applicants enclose copies of the transmittal letter and the stamped filing receipt indicating that the U.S. Patent Office received the priority document on May 16, 2001. Applicants request that the Examiner indicate and/or describe the allegedly missing portion of the certified foreign priority document in the next Communication from the Patent Office.

Applicants thank the Examiner for initialing the references listed on the PTO-1449 form submitted with the Information Disclosure Statement filed on May 16, 2001, thereby confirming that the listed references have been considered.

Applicants herein amend the Abstract of the Disclosure for precision of language. Entry of the amendments to the Abstract is requested.

Claims 1-5 have been examined on their merits.

Applicants herein amend claims 1-5 to conform the claims to U.S. practice, and for precision of language. The amendments to claims 1-5 were made merely to more accurately claim the present invention and do not narrow the literal scope of the claims as originally filed. The amendments to claims 1-5 were not made for reasons of patentability, since, as discussed below, Applicants do not believe that the cited references teach or suggest the present invention.

Applicants herein add new claims 6-13 to more fully claim the present invention. Support for new claims 6-10 can be found, for example, in the original claims 1-5 as well as on pages 3 and

4 of the original specification. Support for new claims 11-13 can be found, for example, on pages 3 and 4 of the original specification. No new matter has been added by claims 6-13. Entry and consideration of the new claims is respectfully requested.

Claims 1-13 are all the claims presently pending in the application.

1. Claims 1-5 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Berry et al. (U.S. Patent No. 6,256,030). Applicants traverse the rejection of claims 1-5, and insofar as the rejection applies to new claims 6-13, at least for the reasons set forth below.

Berry et al. disclose, *inter alia*, a method for using the keyboard of a computing device to navigate from object to object on a graphical user interface. The navigation is done using the arrow or tab keys, and the navigation may occur between objects on the same level or between objects on different levels. *See* col. 8, lines 60-65; col. 9, lines 21-35.

To support a conclusion that a claimed invention lacks novelty under 35 U.S.C. § 102, a single source must teach all of the elements of a claim. *Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 1379 (Fed. Cir. 1986). A single source must disclose all of the claimed elements arranged as in the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989).

Berry et al. fail to teach or suggest that graphical elements are associated with a key list and each key listed in the key lists is associated with an action to be initiated on receipt of a keyboard event corresponding to the key and the graphical element, as recited in claim 1. Instead, as depicted in Figure 7A of Berry et al., the keyboard events are processed and a determination is made as to

how to proceed to the next object that comprises the graphical user interface. *See* Fig. 7A of Berry et al., steps 261, 263, 271, 273 and 277. Notably, the Examiner has failed to cite or indicate any teaching or suggestion in Berry et al. of key lists being associated with each object, nor has the Examiner cited any teaching or suggestion of the key lists containing keys that correspond to keyboard events, as recited in claim 1. Berry et al. simply disclose a navigation method from one GUI object to another GUI object, without any disclosure of a key list or keys associated with specific actions. Therefore, Applicants believe that, under *Richardson* and *Hybritech*, Berry et al. do not anticipate claim 1.

Thus, Applicants believe that claim 1 is allowable over Berry et al., and further believe that claims 2-5 are allowable as well, at least by virtue of their dependency from claim 1.

New independent claim 6 has recitations similar to claim 1. Applicants believe that new claim 6 is allowable at least for the same reasons as claim 1, i.e., no teaching or suggestion of the key lists or keys associated with actions. Applicants further believe that new claims 7-10 are allowable as well, at least by virtue of their dependency from claim 6.

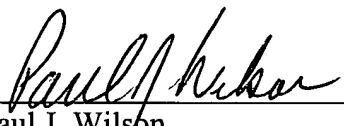
New independent claim 11 has recitations similar to claim 1. Applicants believe that new claim 11 is allowable at least for the same reasons as claim 1, i.e., no teaching or suggestion of the key lists or keys associated with actions. Applicants further believe that new claims 12 and 13 are allowable as well, at least by virtue of their dependency from claim 11.

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. APPLN. NO. 09/855,502  
ATTORNEY DOCKET NO. Q64471

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
Paul J. Wilson  
Registration No. 45,879

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE



23373

PATENT TRADEMARK OFFICE

Date: January 23, 2003

APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

**The claims are amended as follows:**

1. (*Amended*) A method of managing keyboard events for [navigating] a graphical user interface configured in the form of a tree of graphical elements, wherein each graphical element of the tree is associated with a key list [of keys] and wherein each key listed in said key lists is associated with an action to be initiated on receipt of a keyboard event corresponding to said key and said graphical element.

2. (*Amended*) The [A] method according to claim 1, wherein one graphical element is active and a [one] keyboard event is detected by an [the] interface, the method further comprising [including the following steps]:

[-] comparing said keyboard event to the keys listed in said key lists, starting with the list for the active graphical element [component] and working back up said tree, and

[-] initiating the action associated with the first key corresponding to said keyboard event.

3. (*Amended*) A portable system having a graphical interface comprising [including] a keyboard, a screen and an interface management unit, wherein the management unit employs a method of managing keyboard events according to claim 1.

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. APPLN. NO. 09/855,502  
ATTORNEY DOCKET NO. Q64471

4. (*Amended*) The [A] system according to claim 3, wherein the system is a mobile telephone.

5. (*Amended*) The [A] system according to claim 3, wherein the system is a pocket organizer.

**Claims 6-13 are added as new claims.**

**IN THE ABSTRACT OF DISCLOSURE:**

**The abstract is changed as follows:**

A method of managing keyboard events for [navigating] a graphical user interface configured in the form of a tree of graphical elements. Each[, wherein each] graphical element of the tree is associated with a list of keys, and [wherein] each listed key [listed in said lists] is associated with an action to be initiated on receipt of a keyboard event corresponding to the [said] key and the [said] graphical element.